

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ROBERT RODRIGUEZ,  
Petitioner

v.

UNITED STATES OF AMERICA,  
Respondent

CIVIL ACTION  
NO. 04-11869-NMG

**GOVERNMENT'S MOTION TO UNSEAL GRAND JURY MINUTES**

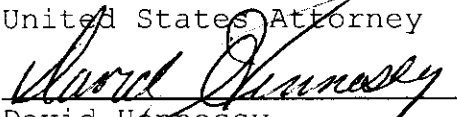
Now comes the United States of America, by its attorneys, Michael J. Sullivan, United States Attorney, and David Hennessy, Assistant U.S. Attorney, and hereby moves this Court to unseal a portion of the transcript of a witness who appeared in the grand jury in connection with the investigation of the above-captioned matter.

In support of this motion, the government states that an order granting this motion is necessary so that the government can respond fully to Petitioner's motion pursuant to 28 U.S.C. § 2255. Moreover, the government does not believe that unsealing grand jury transcripts will compromise the safety of anyone, or of a pending investigation, or otherwise expose anyone to unfair attention or embarrassment.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
David Hennessy  
Assistant U.S. Attorney